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8 Attorneys for Defendant, the  
United States of America (named as "the  
9 alleged United States central government")

10  
11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA  
13 SOUTHERN DIVISION  
14

15 STEPHEN J. LINDSEY, PATRICIA L. )  
LINDSEY, )

16 Plaintiffs,  
17

18 vs.

19 THE ALLEGED UNITED STATES  
CENTRAL GOVERNMENT,

20 Defendant.  
21

Case No. SA CV 11-0588-DOC(Ex)

**STIPULATION TO CONTINUE  
SCHEDULING CONFERENCE**

Present Scheduling Conference –

Date: September 19, 2011

Time: 8:30 a.m.

22 Ctrm: "9-D," Ninth Floor  
411 W. 4<sup>th</sup> Street  
Santa Ana, CA  
23

Proposed Continued Scheduling  
Conference –

Date: October 17, 2011 @ 8:30 a.m.  
24

25 [Hon. David O. Carter]

26 **IT IS HEREBY STIPULATED AND AGREED**, by and between plaintiffs  
27 Stephen J. Lindsey and Patricia L. Lindsey ("plaintiffs" or "the Lindseys"), and  
28 defendant, the United States of America, named in the Verified Complaint as "the

1 alleged United States central government” (“United States” or “defendant”), that the  
2 Scheduling Conference, presently set for September 19, 2011, at 8:30 a.m., be  
3 continued for four (4) weeks until October 17, 2011, at 8:30 a.m., or to the Court’s  
4 next available date thereafter.

5 In support of this stipulation, the parties state as follows:

6 1. This is the parties’ first request for a continuance of the Scheduling  
7 Conference.

8 2. The purpose of this Stipulation is to allow the Court to hold a hearing  
9 and/or make a determination on the Notice of Motion and Motion to Dismiss  
10 Plaintiffs’ Verified Complaint (“Motion to Dismiss”), which defendant filed on  
11 August 4, 2011, and is presently scheduled for hearing on September 12, 2011, at  
12 8:30 a.m., prior to the Scheduling Conference presently set for September 19, 2011,  
13 at 8:30 a.m. The parties wish to obviate the need to meet and confer pursuant to the  
14 “Order Setting Scheduling Conference” and to prepare for and appear at the  
15 Scheduling Conference until after the Court has made a determination on defendant’s  
16 Motion to Dismiss.

17 3. This Stipulation is not being made for the purpose of delay. Rather, the  
18 parties believe that the requested continuance of the Scheduling Conference would  
19 serve the interest of judicial economy and may limit unnecessary litigation.

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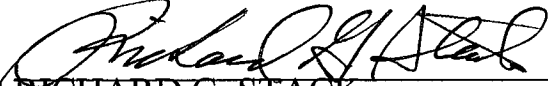
28 ///

1 4. Accordingly, the parties respectfully request that the Court approve this  
2 Stipulation and continue the Scheduling Conference until October 17, 2011, at 8:30  
3 a.m., or to the Court's next available date thereafter.

4  
5 Respectfully submitted,

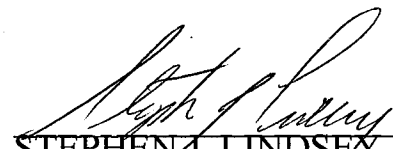
6 ANDRÉ BIROTTE JR.  
7 United States Attorney  
8 SANDRA R. BROWN  
Assistant United States Attorney  
Chief, Tax Division

9 DATED: 8/30/2011


10   
11 RICHARD G. STACK  
Assistant United States Attorney

12 Attorneys for Defendant, the  
13 United States of America (named as "the  
14 alleged United States central government")

15 DATED: 9/1/2011

16   
17 STEPHEN J. LINDSEY  
Plaintiff in *pro per*

18 DATED: 9/1/2011

19   
20 PATRICIA L. LINDSEY  
Plaintiff in *pro per*  
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**PROOF OF SERVICE BY MAILING**

I am over the age of 18 and not a party to the within action. I am employed by the Office of the United States Attorney, Central District of California. My business address is 300 North Los Angeles Street, Suite 7211, Los Angeles, California 90012.

On **September 8, 2011**, I served  
Stipulation to Continue Scheduling Conference  
person and entity name below by enclosing a copy in an envelope addressed as shown below and placing the envelope for collection and mailing on the date and at the place shown below following our ordinary office practices. I am readily familiar with the practice of this office for collection and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

SEE ATTACHED.

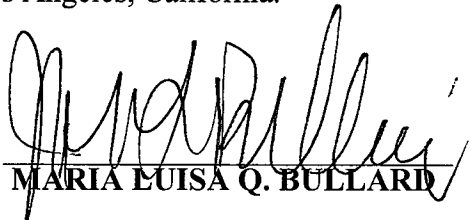
Date of mailing: **September 8, 2011**.

Place of mailing: Los Angeles, California

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on: **September 8, 2011**, Los Angeles, California.

  
MARIA LUISA Q. BULLARD

**SERVICE LIST**

Stephen J. Lindsey, et al. v. The Alleged United States Central Gov't  
Case No. SA CV 11-588-DOC(Ex) (USDC C.D. Cal.)

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